

June 13, 2012

Chip Humphrey  
U.S. Environmental Protection Agency, Region 10  
805 SW Broadway, Suite 500  
Portland, OR 97205

Kristine Koch  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 900, M/S ECL-115  
Seattle, WA 98101

**Re: Lower Willamette River, Portland Harbor Superfund Site  
USEPA Docket No: CERCLA-10-2001-0240  
Monthly Progress Report for May 2012**

Dear Mr. Humphrey and Ms. Koch:

This monthly status report provides information required by the Portland Harbor Superfund Site Administrative Settlement and Administrative Order on Consent (ASOC).

**1. ACTIONS TAKEN IN MAY 2012**

None.

**Deliverables Approved by EPA**

None.

**Deliverables Submitted to EPA**

- LWG provided a background document on hot spots in the Portland Harbor Feasibility Study (FS) on May 4, 2012.
- An Oregon Hot Spot meeting was held with EPA, Oregon Department of Environmental Quality (DEQ), and the Department of Justice (DOJ) on May 10, 2012.
- Draft FS GIS information was provided to EPA on May 24, 2012.
- LWG provided a cross reference table for the April draft FS EPA presentation on May 24, 2012.
- LWG provided an estimated alternative sequencing on May 30, 2012.

**Comments/Documents Provided by EPA**

- On May 10, 2012, EPA requested multiple draft FS GIS shapefiles, an SMA or sub-SMA sequence of construction with time stamps for each alternative in tabular format and the password for the cost spreadsheet.
- On May 21, 2012, DEQ provided a list of seven questions from the May 10, 2012, hot spots meeting.

## **2. PROBLEMS ENCOUNTERED, ANTICIPATED DELAYS, AND SOLUTIONS**

None.

## **3. RESULTS OF SAMPLING, TESTS, AND OTHER DATA RECEIVED**

None.

## **4. SCHEDULE FOR THE NEXT FOUR MONTHS**

Work covered by the ASOC that is currently planned for June, July, August, and September 2012 includes the following:

- June 2012: Redline strike-out comments expected from EPA on draft final Baseline Human Health Risk Assessment
- June 2012: Comments on significant issues from EPA on draft final Baseline Ecological Risk Assessment expected
- July/August 2012: Redline strike-out comments expected from EPA on draft final Remedial Investigation
- July 2012: Initial EPA feedback on draft FS expected

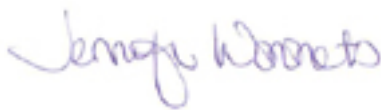
Submittal dates for pending documents currently under preparation by LWG and scheduled for submittal in upcoming months are listed in Table 1 – Status of Active LWG Deliverables – Portland Harbor RI/FS. This table has been reformatted from previously submitted versions to only include pending and recently submitted deliverables for which EPA comments or approvals are required. Table 2 – Status of LWG Deliverables – Portland Harbor RI/FS reflects the more complete list of LWG submittals and is equivalent to the former Table 1 provided in previous progress reports.

## **5. DOCUMENTS AND ISSUES AWAITING EPA RESPONSE**

EPA comments or approvals have not been received on a number of documents that have been submitted to EPA as required by the ASOC; these submittals are listed in Tables 1 and 2. The LWG requests that EPA provide document approvals for these submittals to verify that the terms of the ASOC are being met and issues are resolved to maintain progress on the RI/FS. Also, the LWG believes that many of the documents listed as future submittals in Table 2 are no longer needed (see Status/Comments column) and requests that EPA review the list and confirm that these documents are indeed not needed.

If you have any questions, please give me a call at (503) 972-5014.

Sincerely,



Jennifer Woronets  
LWG Administrative Project Coordinator

Copies: Jim Anderson, ODEQ (email only)  
Matt McClincy, ODEQ (email only)  
Tom Gainer, ODEQ (email only)  
Rob Neely, NOAA (email only)  
Brian Cunninghame, Confederated Tribes of Warm Springs (email only)  
Rose Longoria, Confederated Tribes of Yakama Nation (email only)  
Julie Weis, Confederated Tribes of Siletz (email only)  
Audie Huber, Confederated Tribes of Umatilla (email only)  
J D Williams, Confederated Tribes of Umatilla (email only)  
Brandy Humphreys, Grand Ronde (email only)  
Kim D'Aquila, Grand Ronde (email only)  
Erin Madden, Nez Perce Tribe (email only)  
Colin Wagoner, Ridolfi (email only)  
Jennifer Peers, Stratus Consulting (email only)  
LWG Management  
LWG Repository

**Table 1. Status of Active LWG Deliverables - Portland Harbor RI/FS**

| <b>Deliverable<sup>1</sup></b> | <b>Submittal<br/>Deadline<sup>2</sup></b> | <b>Status/ Comments</b> | <b>EPA<br/>Comments<br/>Target Date</b> |
|--------------------------------|---|-------------------------|---|
| <u>None</u>                    | -   | -                       | -                                       |

Notes:

<sup>1</sup> - **Bolded Deliverables** are primary deliverables per Section XIX., Paragraph 4 of ASOC (EPA 2001a).  
Unbolded Deliverables are secondary deliverables per Section XIX, Paragraph 5 of ASOC.  
*Italicized Deliverables* do not have stipulated penalty amounts.

<sup>2</sup> - Listed Submittal Deadlines are for draft documents. Unless otherwise specified, all final documents are due to EPA 30 days following receipt of comments from EPA.

Deliverable completed and approved by EPA.

Deliverable submitted to EPA and its partners.

Underlining indicates text change from last progress report.

**Table 2. Status of LWG Deliverables - Portland Harbor RI/FS**

| <b>Deliverable<sup>1</sup></b>  | <b>Submittal Deadline<sup>2</sup></b> | <b>Status/ Comments</b>  | <b>EPA Comments Target Date</b> |
|---|---------------------------------------|--|---------------------------------|
| <b>Round 1</b>  |                                       |  |                                 |
| <i>Compilation of Information for Sources Between RM 11 and 11.6 East Bank of Portland Harbor</i>   | November 2007                         | Submitted to EPA and DEQ 11/21/2007. Need written response from DEQ and EPA that upland sources are under investigation consistent with the Road to the ROD.   |                                 |
| <b>Round 2 Biota</b>  |                                       |  |                                 |
| <i>Revised Round 2 QAPP Addendum 6: Sampling of Benthic Invertebrate Tissue</i>                     | 11/23/2005                            | Submitted 11/23/2005; approved with conditions on 12/6/2005; a final QAPP addendum is required   | 12/8/2005                       |
| <i>Final Round 2 QAPP Addendum 6: Sampling of Benthic Invertebrate Tissue</i>                       | TBD                                   | On 2/9/2006, the LWG submitted a response to EPA's comments on the 11/23/2005 version of the QAPP addendum. The LWG has not heard back from EPA on that response. The LWG believes that a final QAPP is not required. Need EPA agreement that this final QAPP is not required. |                                 |
| <b>Hydro/Sed Modeling</b>   |                                       |  |                                 |
| <i>Phase 2 Hydrodynamic Re-calibration Report</i>   | May 2009                              | Submitted 5/7/2009; EPA comments received 7/22/2009  |                                 |
| <b>Groundwater Pathway</b>  |                                       |  |                                 |
| <i>Draft Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan</i>                      | 4/22/2005                             | Submitted 4/22/2005; EPA comments received 6/3/2005  |                                 |
| <i>Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan - Response to EPA Comments</i> | TBD                                   | Outstanding issues to be addressed in GW Appendix to Draft RI Report.  |                                 |

| <b>Deliverable<sup>1</sup></b>  | <b>Submittal Deadline<sup>2</sup></b> | <b>Status/ Comments</b>   | <b>EPA Comments Target Date</b> |
|---|---------------------------------------|---|---------------------------------|
| <i>Revised Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan (including Appendix A - Site Summaries and Appendix B - Pilot Study Data Report)</i> | TBD                                   | Outstanding issues to be addressed in GW Appendix to Draft RI Report.   |                                 |
| <i>Round 2 FSP for Sampling of Shoreline Seeps at Human Use Beaches</i>   | 4/29/2005                             | Submitted 4/29/2005; EPA comments received 6/10/2005  |                                 |
| <i>Revised Round 2 FSP for Sampling of Shoreline Seeps at Human Use Beaches</i>   | No longer needed                      | The only seep determined to pose a potentially complete exposure pathway is discharge from Outfall 22B. The existing data from Outfall 22B include the upland COIs and meet the data quality requirements for risk evaluation (Category 1/QA2). Based on the Round 2 Report evaluations, no additional seep data are needed. Therefore, this FSP is no longer needed. |                                 |
| <i>Revised Round 2 Groundwater Pathway Assessment SAP Attachment 2: Transition Zone Water FSP</i>   | 3/27/2006                             | Redline version submitted 3/27/2006; EPA needs to provide final approval of this FSP. This revised FSP was prepared and submitted after the associated field work was completed.  | 4/28/2006                       |
| <i>Revised Round 2 Groundwater Pathway Assessment SAP Attachment 3: Supplement to QAPP Addendum 3</i>   | 10/7/2005                             | Submitted 10/7/2005: Conditional approval of proposed changes to the QAPP addendum received from EPA on 9/30/2005. EPA needs to provide final approval of this QAPP. Approval to conduct sampling was provided by EPA on 9/30/2005.   |                                 |

| <b>Deliverable<sup>1</sup></b>  | <b>Submittal Deadline<sup>2</sup></b> | <b>Status/ Comments</b>  | <b>EPA Comments Target Date</b> |
|---|---------------------------------------|--|---------------------------------|
| <i>Revised Transition-Zone Water FSP Addendum 1 Sampling Plans for ExxonMobil, Siltronic, Gasco, and Arkema</i> | 3/27/2006                             | Submitted 3/27/2006. EPA needs to provide final approval of this FSP. Approval to conduct sampling was provided by EPA on 9/30/2005. This revised FSP was prepared and submitted after the associated field work was completed.  |                                 |
| <i>Revised Transition-Zone Water FSP Addendum 2</i>   | 3/27/2006                             | Submitted 3/27/2006. EPA needs to provide final approval of this FSP. Approval to conduct sampling was provided by EPA on 10/13/2005. This revised FSP was prepared and submitted after the associated field work was completed. |                                 |
| <b>Natural Attenuation</b>  |                                       |  |                                 |
| <i>Step 2 Natural Attenuation Evaluation Report</i>   | No longer needed                      |  |                                 |
| <b>Tech Memos</b>   |                                       |  |                                 |
| <b>Revised TRV Selection TM</b>   | 10/23/2004                            | Submitted; EPA comments received 3/18/2005. On 6/10/2005, EPA directed the LWG to submit the final TRV Selection TM with the PRE. The final TRV Selection TM was submitted as an appendix to the 9/9/2005 PRE.                   |                                 |
| <b>Second Revision Preliminary Risk Evaluation Approach TM</b>  | 1/7/2005                              | Submitted; EPA comments received 3/4/2005. On 6/10/2005, EPA directed the LWG to submit the final PRE approach TM with the PRE. The final PRE Approach was submitted as an appendix to the 9/9/2005 PRE.                         |                                 |
| <b>Comprehensive ERA Approach TM</b>  | 6/27/2004                             | Submitted; EPA comments received 10/1/2004   |                                 |

| <b>Deliverable<sup>1</sup></b>  | <b>Submittal Deadline<sup>2</sup></b> | <b>Status/ Comments</b>  | <b>EPA Comments Target Date</b> |
|---|---------------------------------------|--|---------------------------------|
| <b>Revised Comprehensive ERA Approach TM</b>  | TBD                                   | In a 1/11/2006 meeting with EPA, the LWG proposed deleting this deliverable. The LWG has not heard back from EPA on this proposal. Need EPA agreement that this deliverable is no longer needed. |                                 |
| Process for Derivation of PRGs TM   | 1/20/2005                             | Submitted; EPA comments received 6/30/2006; a revised tech memo is not required.   | 3/21/2005                       |
| <i>Draft Approach to Determining Background for the Portland Harbor Superfund Site</i>        | 3/3/2006                              | Submitted 3/3/2006; EPA comments received 6/5/2006; revised tech memo required.  | 5/2/2006                        |
| <i>Revised Approach to Determining Background for the Portland Harbor Superfund Site</i>      | 7/20/2006                             | The revised approach to determining background for the Portland Harbor Superfund Site will be provided in the Draft RI Report  |                                 |
| <i>Process for Delineating the Extent of Contamination Upstream and Downstream of the ISA</i> |                                       | The approach for Delineating the Extent of Contamination Upstream and Downstream of the ISA will be provided in the Draft RI Report  |                                 |
| <i>COPC Selection Interim Deliverable</i>   | ~1/23/2006                            | In a 1/11/2006 meeting with EPA, the LWG proposed deleting this deliverable. The LWG has not heard back from EPA on this proposal. Need EPA agreement that this deliverable is no longer needed. |                                 |
| <b>Ecological Preliminary Risk Evaluation (PRE)</b>   | 9/9/2005                              | Submitted 9/9/2005; EPA comments received 4/28/2006, a revised PRE is not required   | 11/8/2005                       |
| <i>Round 2 Benthic Assessment Interpretation Report</i>                                       | 3/17/2006                             | Submitted 3/17/2006; EPA comments received 7/6/2006  | 5/16/2006                       |



| <b>Deliverable<sup>1</sup></b>   | <b>Submittal Deadline<sup>2</sup></b> | <b>Status/ Comments</b>  | <b>EPA Comments Target Date</b> |
|--|---------------------------------------|--|---------------------------------|
| <i>Food Web Modeling Report: Evaluating Trophic Trace and the Arnot and Gobas Models for Application to the Portland Harbor Superfund Site</i> | 11/4/2005                             | Submitted 11/4/2005; EPA comments received 3/10/2006   | 1/3/2006                        |
| <i>Revised Ecological Water Screening Levels</i>   | 5/26/2006                             | Submitted 5/25/2006; directive EPA comments received 9/15/2006, and a correction to the xylene AWQC on 9/27/06. Additional revisions were submitted on 10/13/2006. | 7/9/2006                        |
| <b>Feasibility Study</b>   |                                       |  |                                 |
| Literature Survey of Treatability Studies  | October 2007                          | Submitted 10/31/2007. EPA comments received 2/15/08. A revised deliverable is not required, EPA comments indicated that they should be addressed in the FS.        | Jan-08                          |
| <i>Round 3B (FS) Side-scan Sonar Data Report</i>   | September 2008                        | Submitted 5/18/2009  |                                 |
| <i>Treatment Technologies Screening Table</i>  | Early May 2009                        | Submitted 6/5/2009; EPA comments received 7/9/2009   | 7/6/2009                        |
| <i>Screening of Disposal Facilities for the Feasibility Study Memorandum</i>   | Mid May 2009                          | Submitted 6/18/2009; EPA comments received 7/10/2009   | 7/2/2009                        |
| <i>Early Preliminary Remediation Goals (PRGs)</i>  | Late March 2009                       | Submitted 3/27/2009  |                                 |
| <i>Benthic Toxicity AOPCs Check In Materials</i>   | September 2010                        | Submitted 9/07/2010  |                                 |
| <i>Treatment Technology Evaluation Tools Memo</i>  | -                                     | Submitted 03/15/2011; EPA comments received 4/27/2011  |                                 |

| <b>Deliverable<sup>1</sup></b>   | <b>Submittal Deadline<sup>2</sup></b>                  | <b>Status/ Comments</b>   | <b>EPA Comments Target Date</b> |
|--|--|---|---------------------------------|
| <i>Draft Mitigation Determination Approach for Use in the FS Tools Memo</i>                                    | -  | Submitted 03/15/2011; EPA comments received 4/27/2011               |                                 |
| <i>Draft Feasibility Study Costing Approach Tools Memo</i>   | -  | Submitted 03/15/2011; EPA comments received 4/27/2011               |                                 |
| <i>Draft Identification of "COCs" and Contaminant Mobility Evaluation Criteria For the Draft FS Tools Memo</i> | -  | Submitted 03/16/2011; EPA comments received 4/27/2011               |                                 |
| <i>Dredging Water Quality Evaluation Tools Memo</i>  | -  | Submitted 03/31/2011; EPA comments received 4/27/2011               |                                 |
| Alternatives Screening Materials   |  | Submitted 04/06/2011  |                                 |
| Draft FS Key Elements Presentation   | -  | Submitted Materials 06/06/2011<br>Presentation 06/21 and 06/22/2011 |                                 |
| <i>EPA Directed Draft Feasibility Study (FS) Key Work Product</i>  | 01/15/2012   | Submitted 01/16/2012  | NA                              |
| <b>Draft Feasibility Study (FS) - Electronic Version For Early EPA Team Review</b>                             | 03/20/2012   | Submitted 03/20/2012  | 6/29/2012                       |
| <b>Draft Feasibility Study (FS) - Formal Publically Accessible Submittal</b>                                   | 03/30/2012   | Submitted 03/30/2012  | 6/29/2012                       |
| <i>Validated Analytical Results</i>  | 90 days following completion of each sampling activity |   |                                 |

| <b>Deliverable<sup>1</sup></b>  | <b>Submittal Deadline<sup>2</sup></b> | <b>Status/ Comments</b>   | <b>EPA Comments Target Date</b> |
|---|---------------------------------------|---|---------------------------------|
| Comprehensive Round 2 Site Characterization Summary and Data Gaps Analysis Report | 2/21/2007                             | Submitted 2/21/2007. EPA comments on Sections 1-9 and Appendices A, B, C, D, F, and G received 1/15/08; comments on Section 10 received 3/20/08; comments on Section 11 received 5/16/08; comments on Appendix E received 8/8/08. This document was never intended to be revised or approved by EPA; comments will be addressed in the Draft RI Report. |                                 |
| <i>Draft Sediment Mobility Testing Data Report</i>                                | August 2009                           | Submitted 8/11/2009   | EPA comments not anticipated    |
| <b>Draft Baseline Ecological Risk Assessment Report</b>                           | Early September 2009                  | Submitted 9/2/2009<br>Preliminary EPA comments received 12/23/09.<br>EPA comments received 07/16/2010.<br>EPA benthic approach comments received 09/27/2010.  | 11/2/2009                       |
| <b>Draft Baseline Human Health Risk Assessment Report</b>                         | Late September 2009                   | Submitted 9/23/2009<br>Preliminary EPA comments received 12/23/09.<br>EPA comments received 07/16/2010.   | 11/23/2009                      |
| <b>Draft Remedial Investigation Report</b>  | Late October 2009                     | Submitted 10/27/2009<br>EPA comments received 07/16/2010  | 12/27/2009                      |
| <i>Benthic Toxicity Reanalysis Technical Memorandum</i>                           | Mid November 2009                     | Submitted 11/13/2009<br>EPA benthic approach comments received 09/27/2010.  | 01/13/2009                      |
| <i>Supporting Electronic Information for Draft Benthic BERA</i>                   | November 2009                         | Submitted 11/19/2009  | 01/19/2010                      |
| <b>Draft Final BHHRA</b>  | 5/2/2011                              | Submitted 05/02/2011  | 7/2/2011                        |
| <b>Draft Final BERA</b>   | 7/5/2011                              | Submitted 07/01/2011  | 9/1/2011                        |

| <b>Deliverable<sup>1</sup></b>  | <b>Submittal Deadline<sup>2</sup></b> | <b>Status/ Comments</b>   | <b>EPA Comments Target Date</b> |
|---|---------------------------------------|---|---------------------------------|
| Human Health and Ecological Risk Management Recommendations   | July 2011                             | Submitted 07/22/2011  | 9/22/2011                       |
| <b>Draft Final Remedial Investigation Report</b>  | 8/29/2011                             | Submitted 08/29/2011  | 10/29/2011                      |
| <b>STORMWATER</b>   |                                       |   |                                 |
| <i>Stormwater Loading Check-in Materials</i>  | 2/1/2009                              | Submitted 2/18/2009; EPA comments received 5/6/2009   |                                 |
| <i>Revised Stormwater Loading Calculation Methods</i>   | April 2010                            | Submitted 04/30/2010; EPA comments received 08/17/2010  | 6/30/2010                       |
| <i>Final Stormwater Loading Calculation Methods</i>   |                                       | Submitted 01/31/2011; EPA comments received 03/02/2011<br>Revised Report Submitted 04/15/2011                                       | 3/31/2011                       |
| <b>SEDIMENT</b>   |                                       |   |                                 |
| <i>Round 3B Field Sampling Plan: Sediment Sampling and Benthic Toxicity Testing</i>                 |                                       | Submitted 5/4/2007; EPA comments received 7/25/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.   |                                 |
| <i>Upriver and Multnomah Channel Sediment Evaluation and Field Sampling Plan Technical Approach</i> |                                       | Submitted 5/25/2007; EPA comments received 10/11/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP. |                                 |
| <i>Draft Round 3B Surface and Core Sediment FSP Preliminary Technical Memorandum</i>                |                                       | Submitted 5/25/2007; EPA comments received 8/9/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.   |                                 |
| <i>Draft Round 3B Erosion Core Sediment FSP Technical Memorandum</i>                                | August 2007                           | Submitted 8/29/07; EPA comments received 10/11/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.   |                                 |

| <b>Deliverable<sup>1</sup></b>  | <b>Submittal Deadline<sup>2</sup></b> | <b>Status/ Comments</b>  | <b>EPA Comments Target Date</b>  |
|---|---------------------------------------|--|--|
| <i>Round 3B QAPP Addendum 10 for Sediment Sampling</i>  | November 2007                         | Submitted 12/17/2007. Need EPA approval of this QAPP Addendum.   |  |
| <i>Round 3 Sediment Trap Deployment Field Report</i>  |                                       | Submitted 06/30/2011   |  |
| <b>FATE &amp; TRANSPORT</b>   |                                       |  |  |
| <i>Draft Chemical Fate &amp; Transport Model Development and Data Gaps Identification Report</i>        | July 2007                             | Submitted 7/20/2007; EPA comments received 10/15/07. LWG response to comments submitted 1/8/2008.  |  |
| <i>F&amp;T Surface Sediment FSP – Addendum to 3B Sediment FSP</i>                                       | December 2007                         | Submitted 12/10/2007; EPA comments received 1/2/08. 1/16/08 LWG agreed with EPA not to perform the sampling. Need EPA agreement that this deliverable is no longer needed. |  |
| <i>Draft Bioaccumulation Modeling Report</i>  |                                       | Submitted 7/27/2009  |  |
| <b>CULTURAL RESOURCES</b>   |                                       |  |  |
| <i>Draft Cultural Resource Survey Report</i>  | 12/16/2005                            | Submitted 12/16/2005   | 2/14/2006; EPA comments not time-critical at this point in the project |
| <b>BIOLOGICAL ASSESSMENT</b>  |                                       |  |  |
| <i>Preliminary Draft Site-Wide Biological Assessment - Electronic Version For Early EPA Team Review</i> | 3/30/2012                             | Submitted 03/20/2012   | 6/29/2012  |
| <i>Preliminary Draft Site-Wide Biological Assessment - Formal Publically Accessible Submittal</i>       | 3/30/2012                             | Submitted 03/30/2012   | 6/29/2012  |

Notes:

<sup>1</sup> - **Bolded Deliverables** are primary deliverables per Section XIX., Paragraph 4 of ASOC (EPA 2001a).

Unbolded Deliverables are secondary deliverables per Section XIX, Paragraph 5 of ASOC.

*Italicized Deliverables* do not have stipulated penalty amounts.

<sup>2</sup> - Listed Submittal Deadlines are for draft documents. Unless otherwise specified, all final documents are due to EPA 30 days following receipt of comments from EPA.

**Only deliverables due within the next four months are shown.**

Deliverable completed and approved by EPA.

Deliverable submitted to EPA and its partners.

Underlining indicates text change from last progress report.